

DOCKET #03-CR-10367 MEL

U.S. A.

VS.

JAMES T. RICHARDS

AFFIDAVIT SUPPORTING
MOTION TO SUBPOENA
SEALED REPORT

I, JAMES T. RICHARDS, HEREBY DECLARE:

- (1) THAT, IN SEPTEMBER, 2002, MY DAUGHTER'S GUARDIAN AD LITEM, LUCILLE LEONARD, ISSUED A REPORT WHICH STATED THAT MY EX-WIFE WAS SUFFERING FROM SEVERE MENTAL PROBLEMS WHICH WERE NOT BEING TREATED, TO THE BEST OF MY RECOLLECTION;
- (2) THAT NUMEROUS PEOPLE HAVE RECORDED OR ATTESTED TO MY EX-WIFE'S SEVERE MENTAL PROBLEMS;
- (3) THAT A PSYCHOLOGIST'S REPORT HAS STATED THAT MY EX-WIFE IS MODELING DYSFUNCTIONAL BEHAVIOR TO MY DAUGHTER, THAT MY EX-WIFE HAS A PERSONALITY DISORDER AND A CHEMICAL DEPENDENCY PERSONALITY WHICH NEEDS TO BE MONITORED AND WHICH, AT THE TIME OF THE GAL REPORT, WAS NOT BEING MONITORED AND WHICH DEFENDANT HAS NO REASON TO BELIEVE IS BEING MONITORED CURRENTLY;
- (4) THAT THE SAME PSYCHOLOGIST'S REPORT SAID THAT MY EX-WIFE'S MENTAL PROBLEMS ARE PROBABLY MORE SEVERE THAN WERE INDICATED BY THE LIMITED TESTS GIVEN BY THE PSYCHOLOGIST;
- (5) THAT A SOCIAL WORKER, KELLY DUE, HAS STATED

TO DEFENDANT THAT "YOUR WIFE IS RAISING A NEUROTIC CHILD";

(6) THAT SOCIAL WORKER Anthony Antonelli's, who was once A CASEWORKER FOR THE ~~MASS.~~ MASS. DEPARTMENT OF SOCIAL SERVICES (DSS), STATED IN AN AFFIDAVIT THAT DEFENDANT'S CHILD SHOULD BE REMOVED FROM THE MOTHER'S HOME;

(7) THAT AFFIDAVITS FROM NINE OF DEFENDANT'S FAMILY MEMBERS DESCRIBE DEFENDANT AS A KIND, PATIENT, LOVING FATHER TO HIS DAUGHTER AND DESCRIBE DEFENDANT'S EX-WIFE AS A CRUEL, ABUSIVE MOTHER WHO HAS SERIOUS MENTAL PROBLEMS.

Signed this 13th day of July, 2004 under the penalties of perjury.

James T. Richards

Certificate of Service

I, JAMES T. RICHARDS, HERE BY CERTIFY THAT I sent
COPIES OF:

- (1) "UPDATED MOTION TO DISCHARGE ATTORNEY CONRAD AS
STANDBY COUNSEL", WITH SUPPORTING AFFIDAVIT;
- (2) "MOTION TO UNSEAL EVERYTHING EXCEPT PSYCHIATRIC REPORTS";
- (3) "MOTION TO SUBPOENA SEALED REPORT", WITH AFFIDAVITS
AND EXHIBITS;

TO George Z. TOSCAS, U.S. Justice Dept., CRIMINAL DIVISION,
950 Pennsylvania Ave., N.W., WASHINGTON, D.C. 20530-0001
VIA FIRST-CLASS MAIL, POSTAGE PREPAID, on AUGUST 6,
2004 (ANNIVERSARY OF HIROSHIMA).

James T. Richards